

DEFENDANTS OBJECTION AND ADDITIONAL PROPOSED VOIR DIRE

1. Defendant objects to the use of the term “lawfully” in the second sentence of the Plaintiff’s proposed Voir Dire.

Defendant’s additional proposed Voir Dire:

1. Has any member of the jury panel, or your close friends or family, ever sustained serious personal injury in an accident?

2. Has any member of the jury panel, or your immediate family, ever made a claim for personal injury against anyone?

3. Has any member of the jury panel, or your close friends or family, suffered a serious injury to the head or to the knee? If so, please explain.